



# **City of Hayward**

## **Sewer System Management Plan**

***2020 SSMP Audit***

**March 1, 2021**

# CITY OF HAYWARD 2020 SSMP AUDIT

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## Appendices

Appendix A: 2020 SSMP Audit Checklist

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## **List of Abbreviations**

CY	Calendar Year
CoH	City of Hayward
GWDR	General Waste Discharge Requirement
RWQCB	Regional Water Quality Control Board
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow
SWRCB	State Water Resources Control Board

# CITY OF HAYWARD 2020 SSMP AUDIT

## 1. Introduction

The intent of the audit is to determine whether the SSMP complies with Region 2 and State GWDR requirements, whether the SSMP reflects current City practices, and whether the SSMP is effective in reducing SSOs. The audit fulfills the SSMP Audit requirements of both the RWQCB (Element 10) and the SWRCB GWDR (Element 10). This City of Hayward SSMP audit covers CY 2020. The 2021-2022 SSMP Audit is due to be submitted to the RWQCB by March 15, 2023 along with the Annual Report of SSOs. Annual audits will be kept on file at the City for five years.

## 2. Regulatory Requirements for SSMP Audits

The summarized requirements for SSMP Audits element of the SSMP are:

### RWQCB Requirement:

The City shall conduct a biennial audit of its SSMP which includes any deficiencies and steps to correct them (if applicable), appropriate to the size of its system and the number of overflows.

### SWRCB Requirement:

As part of the SSMP, the City shall conduct periodic internal audits, appropriate to the size of its system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the City's compliance with the SSMP requirements, including identification of any deficiencies in the SSMP and steps to correct them.

## 3. 2020 SSMP Audit

The City conducts a biennial audit of its SSMP. The goal of the audit is to determine whether the SSMP complies with current requirements of the GWDR, whether the SSMP reflects current practices, and whether the SSMP is effective in reducing SSOs.

Program effectiveness is evaluated by a review of performance indicators and discussion of SSMP and sewer system improvements.

Program compliance is evaluated by review of SSMP elements using the Audit Checklist. The Audit Checklist includes comments regarding recently completed program updates and recommendations for future actions.

## 4. SSMP Effectiveness

### Performance

Performance indicators, collected as part of Element IX (Monitoring, Measurement, and Program Modifications) have been reviewed to identify patterns and trouble areas needing improvement. Performance indicators for 2020 are summarized in Table 1.

### Program and System Improvements

This report describes the City of Hayward's SSMP program audits and its associated tasks. This SSMP audit is being performed to:

- Evaluate the effectiveness of the current SSMP program
- Identify potential weaknesses of the current SSMP program
- Determine improvement opportunities for modifying the current SSMP program

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## **WDR Requirements for SSMP Element 10: SSMP Program Audits**

*As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.*

## **The City of Hayward's Compliance Approach – As Stated in the SSMP**

The City will produce internal audits every two years to determine the effectiveness of the SSMP elements and programs. The program audit will include a review of relevant data and trends maintained as part of the SSMP Monitoring and Measurements Program to determine opportunities to improve compliance with the SSMP requirements. A prioritized list of improvement opportunities will be updated as part of the audit program. Improvement Opportunities will be used to prioritize and develop program modifications and will be initiated based on priority and available funding. An overview of SSMP related work completed between audits will be included in the program audit.

The program audit will include a final report reviewing the City of Hayward's performance and identifying findings. The report will be posted on the City's website and will be kept on file.

## **The City of Hayward Sewer Collection System Description and Performance**

The City of Hayward's Sewer Collection System, including trunk sewers consists of approximately 321 miles of gravity sewers ranging from 4 inches to 48 inches in diameter and approximately 4 miles of force mains ranging from 4 inches to 27 inches in diameter. The conveyance system also consists of nine pump stations, two inverted siphons, flow meters, and valve vaults. From January 2020 through December 2020, the City of Hayward's Sewer Collection System has had a total of four (4) SSO. Reported to the California Integrated Water Quality System (CIWQS) as detailed in **Table 1**.

**Table 1: CIWQS Summary of Hayward's SSOs CY 2020**

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SSO Cat	Start Date	SSO Address	SSO Volume	Volume Recovered	Volume Reached Surface Water	SSO Cause
3	02/13/20	Mission & Calhoun	300	280	0	Roots
3	05/21/20	390 Industrial Parkway	620	540	0	Debris-Rags
3	09/09/20	2836 Trimble Ct	120	110	0	Roots
3	12/02/20	3126 Oakes Dr	380	370	0	Paper Towels / Grease

Considered the relatively low number of SSO's compared to the miles of sewer mains in Hayward's sewer collection system, this year we were dealing with COVID-19 shutdowns and limited staffing, the following audit program has been developed for the system.

## Audit Tasks

1. Compare SSMP with current operation and maintenance activities and priorities, and update or amend accordingly.
2. Review operation and maintenance philosophy/strategy with Sewer Collection and Utilities Operations & Maintenance field staff.
3. Review maintenance records to ensure that a match exists between operation and maintenance philosophy/strategy and everyday practice.
4. Review condition assessment/rehabilitation philosophy/strategy with Utilities Engineering Section and ensure that the condition assessment/rehabilitation schedule is current and relevant.
5. Record all findings during the audit process on the attached SSMP Audit Form. This form will be the final audit report for the City of Hayward's Sewer Collection System's performance and improvement opportunities. The report will be kept on file and made available to the public either as a reference or posting on the City's website.

## Conclusion

The City of Hayward's existing SSMP elements and programs, after being updated are effective for its type of collection system.

With the four total SSO events within 2020 the City's performance is favorable when compared to other districts with similar size collection systems. The volume of Hayward's SSOs, both average per event and total volume spilled is on par or better than other districts in Region 2.

Hayward's SSO's were attributed to a root mass that had passed a maintenance crew earlier in the week and lodged itself in a turn downstream, rag deposits in an 8" main line from a nearby apartment complex, the main line had been hydro cleaned recently and is currently on the CIP to be upsized. The others were a random rag mass and roots from a grove of redwood trees in a backyard easement. To address aging infrastructure, offsets and root intrusion, the City has an ongoing program for replacement or repair of any deteriorating mains discovered during main inspection and televising. The City also aggressively

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monitors, cleans and chemically treats for roots in any mains located in easements as well as any mains with a history of root intrusion. This program has been in place since 2011 and will continue indefinitely.

The City has an ongoing main line replacement program, where damaged or deteriorated mains are replaced or repaired as they are discovered.

The SSMP and the City's operation and maintenance strategies are essential elements used to manage, operate, and maintain all parts of the sewer collection system, and are continually being evaluated and improved upon. Although this audit identified few improvement opportunities, most of the updates of the SSMP are administrative in nature, and do not detract from the effectiveness of the SSMP.

## Improvement Opportunities

The following improvement opportunities have been identified based on this audit.

SSMP Section	Updates	Date Updated
Goals	No changes, chapter still relevant to organization's mission.	March 2012
Organization	Updated contact info, assignments, and org chart due to Department recent staffing changes and hires.	March 2021
Legal Authority	No changes, chapter still relevant to organization's mission.	February 2016
Operation & Maintenance	Updated Staffing, Vehicles, Certification Info, High Frequency Main Cleaning schedule. Training adjustments due to COVID-19	March 2021
Design & Performance Provisions	Updated Department name, chapter still relevant to organization's mission.	March 2021
Overflow Emergency Response Plan	No Changes.	March 2020
Fats, Oils, & Grease (FOG) Control Program	No changes, chapter still relevant to organization's mission.	March 2018
System Evaluation & Capacity Assurance Plan	Updated Department name, chapter still relevant to organization's mission.	March 2021
Monitoring, Measurement & Program Modifications	(B), SSO info, table, staffing and resources.	March 2021
SSMP Program Audits	Included Calendar Year 2012-2013, 2015, 2016/2017 2018/2019 and 2020 SSMP Audit.	March 2021
Communication Program	Updated attachments to web links	March 2021

## 5. SSMP Compliance

The Audit Checklist is used to demonstrate the City's compliance with Region 2 and State GWDR requirements for sanitary sewer systems. The audit checklist indicates whether each SSMP element is compliant, describes recent revisions or updates and recommends future actions to maintain effective SSMP elements that reflect current City practices. The Audit Checklist, completed for CY 2020, is included in **Appendix A**.

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## Appendix A: 2020 SSMP Audit Checklist



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Element	Title	Requirement	Compliant	Current	Comments
I	Goals	Reduce, prevent, and mitigate SSOs	Y	Y	No changes, chapter still relevant to organization mission.
II	Organization	Designate Legally Responsible Official (LRO)	Y	Y	No changes recommended.
		Organization Chart	Y	Y	Updated to reflect 2020 staff changes.
		Names and phone numbers for key personnel	Y	Y	Updated to reflect 2020 staff changes.
		Chain of communication for reporting SSOs	Y	Y	Updated to reflect 2020 staff and process changes in the reporting procedure.
III	Legal Authority	Prevent illicit discharges to sanitary sewer system	Y	Y	No changes recommended.
		Require sewers and connection be properly designed and constructed	Y	Y	No changes recommended.
		Ensure access for inspection, maintenance, and repairs	Y	Y	No changes recommended.
		Limit discharge of FOG and debris that may cause blockages	Y	Y	No changes recommended.
		Ability to inspect FOG producing facilities	Y	Y	No changes recommended.
		Enforce violations of the City ordinances	Y	Y	No changes recommended.
IV	O&M Program	Maintain up-to-date maps of the sanitary sewer system	Y	Y	No changes recommended.
		Adequate planning, resources and budget to support effective sewer system management and long term goals	Y	Y	No changes recommended.
		Describe routine preventive maintenance program	Y	Y	Updated with current PM schedules.
		Document completed preventive maintenance	Y	Y	No changes recommended.
	O&M Program (cont'd)	Adequate I/I monitoring	Y	Y	No changes recommended.

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Element	Title	Requirement	Compliant	Current	Comments
		Rehabilitation and replacement plan that identifies and prioritizes sanitary sewer system defects	Y	Y	Defects are repaired when discovered.
		Provide regular technical training for sewer system staff	Y	Y	Collections Crew attend CWEA training regularly and DKF currently due to COVID restrictions. Management staff attends BACWA-CS regularly (currently via ZOOM).
		Require contractors to provide training for their workers who work in the City's sewer system facilities	Y	Y	No changes recommended.
		Maintain equipment inventory	Y	Y	No changes recommended.
		Maintain critical spare part inventory	Y	Y	No changes recommended.
		Outreach to plumbers and contractors	Y	Y	Sewer Lateral Responsibilities door hangers developed to address maintenance responsibilities for laterals and appurtenances on customer property.
<b>V</b>	<b>Design and Performance Provisions</b>	Design and construction standards for new sanitary sewer system facilities	Y	Y	No changes recommended.
		Design and construction standards for repair and rehabilitation of existing sanitary sewer system facilities	Y	Y	Updated with current PW Standard Specs for Sewer Mains.
		Procedures for the inspection and acceptance of new sanitary sewer system facilities	Y	Y	Updated with current PW Standard Specs for Sewer Mains.
		Procedures for the inspection and acceptance of repaired and rehabilitated sanitary sewer system facilities	Y	Y	Updated with current PW Standard Specs for Sewer Mains.

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Element	Title	Requirement	Compliant	Current	Comments
VI	<b>Overflow Emergency Response Plan (OERP)</b>	Procedures for the notification of primary responders	Y	Y	Updated with new City of Hayward SSO SOP, SSO determination flow charts, notification information, & Reporting Procedures.
		Procedures for the notification of regulatory agencies	Y	Y	All call-out lists are updated and distributed to City departments and satellite cities.
		Program to ensure appropriate response to all SSOs	Y	Y	Updated with new City of Hayward SSO SOP, SSO determination flow charts, notification information, & Reporting Procedures.
		Proper reporting of all SSOs	Y	Y	Updated with new City of Hayward SSO SOP, SSO determination flow charts, notification information, & Reporting Procedures.
		Procedure to ensure City staff are aware of and follow OERP	Y	Y	New SSO SOP distributed to all staff, reviewed periodically, and updated as required.
		Procedure to ensure City staff are trained in the OERP procedures	Y	Y	New SSO SOP distributed to all staff, reviewed periodically, and updated as required.
		Procedure to ensure contractor personnel are trained in the OERP procedures	Y	Y	No changes recommended.
		Procedures to address emergency operations such as traffic and crowd control	Y	Y	All employees have been trained in Traffic Control / Flagger; new employees are trained when hired.
	<b>O.E.R.P. (cont'd)</b>	Program to prevent the discharge of sewage to surface waters	Y	Y	Updated with new City of Hayward SSO SOP, SSO determination flow charts, notification information, & Reporting Procedures.

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Element	Title	Requirement	Compliant	Current	Comments
		Program to minimize or correct the impacts of any SSOs that occur	Y	Y	Updated with new City of Hayward SSO SOP, SSO determination flow charts, notification information, & Reporting Procedures.
		Program of accelerated monitoring to determine the impacts on surface waters of any SSOs that occur	Y	Y	Updated with new City of Hayward SSO SOP, SSO determination flow charts, notification information, & Reporting Procedures.
<b>VII</b>	<b>FOG Control Program</b>	Identification of "hot spots" with FOG-related problems	Y	Y	No changes recommended.
		Public outreach program that promotes the proper disposal of FOG	Y	Y	No changes recommended.
		Plan for the disposal of FOG generated within the City's service area	Y	Y	No changes recommended.
		Demonstrate that the City has allocated adequate resources for FOG control	Y	Y	No changes recommended.
		Program of preventive maintenance for sanitary sewer system facilities that have FOG-related problems	Y	Y	No changes recommended.
<b>VIII</b>	<b>System Evaluation and Capacity Assurance Program (SECAP)</b>	Identification of elements of the sanitary sewer system that experience or contribute to SSOs caused by hydraulic deficiencies	Y	Y	No changes recommended.
		Established design criteria that provide adequate capacity	Y	Y	Master Plan ensures that sewer system capacity is adequate to serve existing and future development.
		Short term CIP that addressed known hydraulic deficiencies	Y	Y	No changes recommended.
	<b>SECAP (cont'd)</b>	Long term CIP that provides for future capacity needs	Y	Y	No changes recommended.

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Element	Title	Requirement	Compliant	Current	Comments
		Procedures that provide for the analysis, evaluation, and prioritization of hydraulic deficiencies	Y	Y	No changes recommended.
		The short- and long-term CIPs include schedules for the correction of each identified hydraulic deficiency	Y	Y	Engineer and have a main line bore for the Willimet area to improve conveyance across 880 – We are currently in the approval (CalTrans) & Design process with our consultant
<b>IX</b>	<b>Monitoring, Measurement, and Program Modifications (MMPM)</b>	Maintain relevant information to establish, evaluate, and prioritize SSMP activities	Y	Y	No changes recommended.
		Monitor implementation of the SSMP	Y	Y	No changes recommended.
		Measure, where appropriate, performance of the elements of the SSMP	Y	Y	No changes recommended.
		Assess success of the preventive maintenance program	Y	Y	No changes recommended.
		Update SSMP program elements based on monitoring or performance	Y	Y	No changes recommended.
		Identify and illustrate SSO trends	Y	Y	No changes recommended.
<b>X</b>	<b>SSMP Program Audits</b>	Conduct periodic audits	Y	Y	Audits are performed biennial.
		Record results of the audit in a report	Y	Y	Audits are performed biennial.
		Record changes made and/or corrective actions taken	Y	Y	Audits are performed biennial.
<b>XI</b>	<b>Communications Program</b>	Communicate with the public regarding the preparation of the SSMP	Y	Y	Homeowner/Resident/Business lateral responsibility pamphlet.
		Communicate with the public regarding SSMP performance	Y	Y	Homeowner/Resident/Business lateral responsibility pamphlet.

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Element	Title	Requirement	Compliant	Current	Comments
	<b>Communications Program (cont'd)</b>	Communicate with satellite sewer systems	Y	Y	The City communicates regularly with neighboring cities and districts.

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